



February 26, 2015

Mr. Ted Wells
Sutter Home Winery
P O Box 248
St. Helena, CA 94574

**Re: Notice of Minor Title V Permit Modification
District Facility # N-7855
Project # N-1150508**

Dear Mr. Wells:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct N-7855-854-2 (under project N-1143376) into the Title V operating permit. The project was to change pressure differential gauge operating range limit from "2.5 to 5.0 inches of water column" to "0.1 to 5.0 inches of water column" for the dust collector serving a diatomaceous earth receiving and transfer operation.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-7855-854-2, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email
Seyed Sadredin
Executive Director/Air Pollution Control Officer

Title V APPLICATION REVIEW Minor Modification

Facility Number: N-7855
Facility Name: Sutter Home Winery
Mailing Address: P O Box 248
St. Helena, CA 94574

Contact Name: Ted Wells
Phone: (209) 263-3228

Responsible Official: Ted Wells
Title: Environmental Compliance Engineering Manager

Processing Staff: Jag Kahlon
Project Number: N-1150508
Date: February 25, 2015

I. PROPOSAL

Sutter Home Winery has proposed to incorporate Authority to Construct (ATC) permit N-7855-854-2 into their Title V operating permit. This permit was issued without Certificate of Conformity (COC). The project was to change pressure differential gauge operating range limit from "2.5 to 5.0 inches of water column" to "0.1 to 5.0 inches of water column" for the dust collector serving a diatomaceous earth receiving and transfer operation.

The purpose of this document is to identify all applicable requirements, determine if the facility will comply with the applicable requirements, and to provide the legal and factual basis for permit requirements.

II. FACILITY LOCATION

This facility is located at 18667 N Jacob Brack Road, Lodi, California.

III. EQUIPMENT DESCRIPTION

N-7855-854-3
DIATOMACEOUS EARTH MATERIAL RECEIVING AND TRANSFER
OPERATION CONSISTING OF FOUR BULK BAG UNLOADERS EACH
EQUIPPED WITH AN ENCLOSED HOPPER AND ASSOCIATED ENCLOSED
SCREW CONVEYOR ALL SERVED BY A DONALDSON TORIT MODEL DFO 3-3
DUST COLLECTOR SYSTEM

IV. SCOPE OF EPA AND PUBLIC REVIEW

This project is a Minor Modification under Rule 2520 since the ATC project under which permit N-7855-854-2 was issued was not an SB-288 or Federal Major Modification under Rule 2201. Therefore, public review is not required for this project.

V. APPLICABLE REQUIREMENTS

Rule 2520 Federally Mandated Operating Permits (6/21/01)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The following section details the changes made to PTO N-7855-854-1 during project N-1143376 that resulted in ATC N-7855-854-1.

N-7855-854-2

Condition #4 in PTO N-7855-854-1

"The differential pressure, as indicated by the pressure differential gauge on the dust collector, shall stay between 2.5 to 5.0 inches of water column, when the unloading process operates. [District Rule 2201]"

The pressure differential gauge reading range has been changed to "0.1 to 5.0 inches of water column". The condition is being stated as follows:

"The differential pressure, as indicated by the pressure differential gauge on the dust collector, shall stay between 0.1 to 5.0 inches of water column, when the unloading process operates. [District Rule 2201]"

Note that this condition is now federally enforceable through Title V permit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, the proposed project:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;

3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act;
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs (Appendix IV) ;
2. The source's suggested draft permit (Appendix I); and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used (Appendix III).

Compliance is expected with this Rule.

APPENDICES

Appendix I:	Proposed Title V Operating Permit No. N-7855-854-3
Appendix II:	Authority to Construct Permit N-7855-854-2
Appendix III:	Permit Application
Appendix IV:	Emissions Change
Appendix V:	Previous Permit to Operate N-7855-854-1

Appendix I
Proposed Title V Operating Permit No. N-7855-854-3

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-7855-854-3

EXPIRATION DATE: 03/31/2018

EQUIPMENT DESCRIPTION:

DIATOMACEOUS EARTH MATERIAL RECEIVING AND TRANSFER OPERATION CONSISTING OF FOUR BULK BAG UNLOADERS EACH EQUIPPED WITH AN ENCLOSED HOPPER AND ASSOCIATED ENCLOSED SCREW CONVEYOR ALL SERVED BY A DONALDSON TORIT MODEL DFO 3-3 DUST COLLECTOR SYSTEM

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from the dust collector serving the diatomaceous earth unloading system shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
3. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The differential pressure, as indicated by the pressure differential gauge on the dust collector, shall stay between 0.1 to 5.0 inches of water column, when the unloading process operates. [District Rule 2201] Federally Enforceable Through Title V Permit
5. A spare set of cartridge filters for the dust collector shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
6. PM10 emissions from this operation shall not exceed 0.003 pounds per ton of diatomaceous earth unloaded. [District Rule 2201] Federally Enforceable Through Title V Permit
7. No more than 70 tons of diatomaceous earth shall be unloaded in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The permittee shall keep records of date and quantity of diatomaceous earth unloaded. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Differential operating pressure shall be monitored and recorded on each day that the unloading process operates [District Rule 2201] Federally Enforceable Through Title V Permit
10. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
11. All records shall be retained for a minimum of five years and made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Appendix II
Authority to Construct Permit N-7855-854-2



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-7855-854-2

ISSUANCE DATE: 11/17/2014

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY
MAILING ADDRESS: ATTN: DAVE HENRY
P O BOX 248
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD
LODI, CA 95242

EQUIPMENT DESCRIPTION:

MODIFICATION OF DIATOMACEOUS EARTH MATERIAL RECEIVING AND TRANSFER OPERATION CONSISTING OF FOUR BULK BAG UNLOADERS EACH EQUIPPED WITH AN ENCLOSED HOPPER AND ASSOCIATED ENCLOSED SCREW CONVEYOR ALL SERVED BY A DONALDSON TORIT MODEL DFO 3-3 DUST COLLECTOR SYSTEM: TO RE-ESTABLISH PRESSURE DIFFERENTIAL GAUGE OPERATING RANGE LIMIT

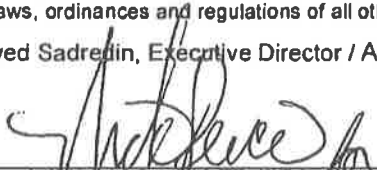
CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Visible emissions from the dust collector serving the diatomaceous earth unloading system shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
5. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The differential pressure, as indicated by the pressure differential gauge on the dust collector, shall stay between 0.1 to 5.0 inches of water column, when the unloading process operates. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


Arnaud Marjollet, Director of Permit Services
N-7855-854-2 : Nov 17 2014 7:40AM - KAH-LONJ : Joint Inspection NOT Required

7. A spare set of cartridge filters for the dust collector shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from this operation shall not exceed 0.003 pounds per ton of diatomaceous earth unloaded. [District Rule 2201] Federally Enforceable Through Title V Permit
9. No more than 70 tons of diatomaceous earth shall be unloaded in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The permittee shall keep records of date and quantity of diatomaceous earth unloaded. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Differential operating pressure shall be monitored and recorded on each day that the unloading process operates [District Rule 2201] Federally Enforceable Through Title V Permit
12. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
13. All records shall be retained for a minimum of five years and made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

Appendix III
Permit Application




San Joaquin Valley Air Pollution Control District

www.valleyair.org



Permit Application For:

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [X] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <u>SUTTER HOME WINERY</u>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>PO Box 248</u> CITY: <u>ST HELENA</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>94574</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>18667 N. JACOB BRACK ROAD</u> CITY: <u>LOST</u> 1/4 SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <u>WINE MAKING</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <u>TITLE V PERMIT MOD TO INCLUDE</u> <u>DE DISTRIUTION SYSTEM N-7855-858-2</u>	
6. TYPE OR PRINT NAME OF APPLICANT: <u>TED WELLS</u>	TITLE OF APPLICANT: <u>ENV COMP</u> <u>ENG MANAGER</u>
7. SIGNATURE OF APPLICANT: 	DATE: <u>2/20/2015</u> PHONE: <u>(209) 263 3228</u> FAX: <u>()</u> EMAIL: <u>TWELLSRTFFWINES.COM</u>

For APCD Use Only:

DATE STAMP: RECEIVED FEB 23 2015 SJVAPCD	FILING FEE RECEIVED: \$ <u>0</u> CHECK#: _____ DATE PAID: _____ PROJECT NO: <u>N1150508</u> FACILITY ID: <u>N-7855</u>
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Central Region • 1990 E. Gettysburg Avenue • Fresno, CA 93726-0244 • (559) 230-5900 • FAX (559) 230-6061



San Joaquin Valley
Unified Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

☒ SIGNIFICANT PERMIT MODIFICATION
☒ MINOR PERMIT MODIFICATION

☒ ADMINISTRATIVE
AMENDMENT

N-7855

COMPANY NAME: SUTTER HOME WINERY	FACILITY ID: -
1. Type of Organization: <input checked="" type="checkbox"/> Corporation [] Sole Ownership [] Government [] Partnership [] Utility	
2. Owner's Name:	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

TEP Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).

TEP Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.

TEP Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

TEP Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

[Signature]
Signature of Responsible Official

2/20/2015
Date

TEP WELLS
Name of Responsible Official (please print)

ENVIRONMENTAL COMPLIANCE ENGINEERING MANAGER
Title of Responsible Official (please print)

Appendix IV Emissions Change

Emissions Change

Per application review under project N-1143376, quarterly emissions change for each permit unit is 0 pounds of PM₁₀ emissions.

Appendix V
Previous Permit to Operate N-7855-854-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-7855-854-1

EXPIRATION DATE: 03/31/2018

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